

CHRISTOPHER A. NEDEAU (CA SBN 81297)  
CARL L. BLUMENSTEIN (CA SBN 124158)  
VERONICA L. HARRIS (CA SBN 256120)  
NOSSAMAN LLP  
50 California Street, 34th Floor  
San Francisco, CA 94111  
Telephone: 415.398.3600  
Facsimile: 415.398.2438  
[cnedeau@nossaman.com](mailto:cnedeau@nossaman.com)  
[cblumenstein@nossaman.com](mailto:cblumenstein@nossaman.com)  
[vharris@nossaman.com](mailto:vharris@nossaman.com)

Attorneys for defendants AU OPTRONICS CORPORATION  
and AU OPTRONICS CORPORATION AMERICA

[additional counsel listed on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ALFRED H. SIEGEL, AS TRUSTEE OF THE  
CIRCUIT CITY STORES, INC. LIQUIDATING  
TRUST,

Plaintiff,

v.

AU OPTRONICS CORPORATION; AU  
OPTRONICS CORPORATION AMERICA,  
INC.; CHI MEI CORPORATION; CHI MEI  
OPTOELECTRONICS CORPORATION; CHI  
MEI OPTOELECTRONICS USA, INC.; CMO  
JAPAN CO. LTD.; NEXGEN MEDIATECH,  
INC.; NEXGEN MEDIATECH USA, INC.;  
CHUNGHWA PICTURE TUBES LTD.;  
TATUNG COMPANY OF AMERICA, INC.;  
EPSON IMAGING DEVICES  
CORPORATION; EPSON ELECTRONICS  
AMERICA, INC.; HANNSTAR DISPLAY  
CORPORATION; LG DISPLAY CO. LTD.; LG  
DISPLAY AMERICA, INC.; SAMSUNG  
ELECTRONICS CO., LTD.; SAMSUNG  
SEMICONDUCTOR, INC.; SAMSUNG  
ELECTRONICS AMERICA, INC.; SHARP  
CORPORATION; SHARP ELECTRONICS;  
TOSHIBA CORPORATION;  
TOSHIBA AMERICA ELECTRONICS  
COMPONENTS, INC.;  
TOSHIBA MOBILE DISPLAY CO., LTD.;  
TOSHIBA AMERICA INFORMATION  
SYSTEMS, INC.; HITACHI, LTD.; HITACHI

CASE NO. 10-cv-5625 SI

Master File No. 07-cv-1827 SI

MDL No. 1827 SI

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING TIME TO RESPOND TO  
COMPLAINT**

1 DISPLAYS, LTD.; AND HITACHI  
2 ELECTRONIC DEVICES (USA), INC.,

3 Defendants.

4 WHEREAS, plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating  
5 Trust ("Circuit City Trust"), filed a complaint in the above-captioned case against defendants AU  
6 Optronics Corporation, AU Optronics Corporation America, Chi Mei Corporation, Chi Mei  
7 Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co. Ltd., Chunghwa  
8 Picture Tubes, Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc., Epson Imaging Devices  
9 Corporation, Epson Electronics America, Inc., HannStar Display Corporation, LG Display Co. Ltd., LG  
10 Display America, Inc., Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung  
11 Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation, Tatung Company of  
12 America, Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba Mobile Display  
13 Co., Ltd., Toshiba America Information Systems, Inc., Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi  
14 Electronic Devices (USA), Inc. (collectively "Stipulating Defendants") on December 10, 2010;

15  
16 WHEREAS, Circuit City Trust and all Stipulating Defendants except Chunghwa Picture Tubes,  
17 Ltd. and Tatung Company of America entered into a Stipulation of Extension of Time to Respond to  
18 Complaint and Waiver of Service dated February 2, 2011, which provided that those defendants thereto  
19 would accept service of the Complaint filed by Circuit City Trust and would have ninety (90) days in  
20 which to respond to the Complaint (the "Initial Stipulation"). The Initial Stipulation was entered by the  
21 Court on February 4, 2011 (Document 2410 in 3:07-md-01827).

22  
23 WHEREAS, Circuit City Trust and Tatung Company of America entered into a Stipulation of  
24 Extension of Time for Defendant Tatung Company of America to Respond to Complaint dated February  
25 23, 2011, which provided that Tatung would have the same time period as provided in the Initial  
26 Stipulation in which to respond to the Complaint filed by Circuit City Trust (the "Tatung Stipulation").  
27 The Tatung Stipulation was entered by the Court on February 23, 2011 (Document 18 in 3:10-cv-  
28 05625).

1 WHEREAS, on March 24, 2011, the Court entered an Order Granting Plaintiff's Motion for  
2 Order to Serve Defendant Chunghwa Picture Tubes Through Its U.S. Counsel (Document 2584 in 3:07-  
3 md-01827). Following that order, Circuit City Trust entered into a Stipulation of Extension of Time for  
4 Defendant Chunghwa Picture Tubes to Respond to Complaint dated March 25, 2011, which provided  
5 that Chunghwa would have the same time period as provided in the Initial Stipulation in which to  
6 respond to the Complaint filed by Circuit City Trust (the "Chunghwa Stipulation"). The Chunghwa  
7 Stipulation was entered by the Court on March 28, 2011 (Document 26 in 3:10-cv-05625).

8  
9 WHEREAS, Circuit City Trust desires to file an Amended Complaint, a copy of which is  
10 attached hereto as Exhibit A.

11 WHEREAS, in order to avoid potentially redundant motion practice, briefing and/or responsive  
12 pleadings, Circuit City Trust and Stipulating Defendants agree and so stipulate that the Amended  
13 Complaint should be filed and the Stipulating Defendants should have thirty (30) days from the date on  
14 which it is filed to move to dismiss, answer or otherwise respond to the Amended Complaint. Circuit  
15 City Trust and the Stipulating Defendants believe that proceeding in this way will create efficiency for  
16 the Court and all parties.

17 THEREFORE, Circuit City Trust and Stipulating Defendants hereby agree:

18 1. The Amended Complaint of Circuit City Trust should be filed and accepted for filing by  
19 the Court.

20 2. Defendants will have thirty (30) days from the date on which the Amended Complaint is  
21 filed and accepted for filing by the Court in which to move to dismiss, answer or otherwise respond to  
22 the Amended Complaint.

23  
24 Plaintiff and Stipulating Defendants further and jointly respectfully request that the Court enter  
25 this stipulation as an order.

26 /

27 /

28 /

1 Dated: May 3, 2011

2  
3 SO ORDERED:

4 

5 Honorable Susan Illston

6 5/4/11

7 Date Entered

1 Dated: May 3, 2011

SUSMAN GODFREY L.L.P.

2  
3 By: s/Kenneth S. Marks  
4 Kenneth S. Marks

5 Kenneth S. Marks (*PRO HAC VICE*)  
6 1000 Louisiana Street, Suite 5100  
7 Houston, Texas 77002  
8 (713) 653-7854 (Direct)  
9 (713) 654-3381 (Fax)

10 Attorneys for Plaintiff ALFRED H. SIEGEL,  
11 AS TRUSTEE OF THE CIRCUIT CITY  
12 STORES, INC. LIQUIDATING TRUST

13 NOSSAMAN LLP

14 By: s/Christopher A. Nedeau  
15 Christopher A. Nedeau

16 Christopher A. Nedeau (Bar No. 81297)  
17 50 California Street, 34th Floor  
18 San Francisco, CA 94111  
19 Tel: (415) 398-3600  
20 Fax: (415) 398-2438

21 Attorneys for Defendants  
22 AU OPTRONICS CORPORATION AND  
23 AU OPTRONICS CORPORATION  
24 AMERICA  
25  
26  
27  
28

DAVIS POLK & WARDWELL LLP

By: s/Christopher B. Hockett  
Christopher B. Hockett

Christopher B. Hockett (Bar No. 121539)  
Neal A. Potischman (Bar No. 254862)  
Sandra West (Bar No. 250389)  
Samantha H. Knox (Bar No. 254427)  
1600 El Camino Real  
Menlo Park, California 94025  
(650) 752-2000 / (650) 752-2111

Attorneys for Defendants  
CHI MEI OPTOELECTRONICS CORP.  
(sued as CHIMEI INNOLUX CORP.),  
CMO JAPAN CO., LTD., and CHI MEI  
OPTOELECTRONICS USA, INC.

GIBSON, DUNN & CRUTCHER LLP

By: s/Rachel S. Brass  
Rachel S. Brass

Rachel S. Brass (Bar No. 219301)  
555 Mission Street  
San Francisco, CA 94105-2933  
Tel: (415) 393-8200  
Fax: (415) 393-8306

Attorneys for DefendantS  
CHUNGHWA PICTURE TUBES, LTD.  
and TATUNG COMPANY OF  
AMERICA, INC.

MORRISON & FOERSTER LLP

By: s/Stephen P. Freccero  
Stephen P. Freccero

Melvin R. Goldman (Bar No. 34097))  
Stephen P. Freccero (Bar No. 131093)  
Derek F. Foran (Bar No. 224569)  
425 Market Street  
San Francisco, CA 94105-2482  
Tel: (415) 268-7000  
Fax: (415) 268-7522

Attorneys for Defendants  
EPSON IMAGING DEVICES  
CORPORATION AND EPSON  
ELECTRONICS AMERICA, INC.

K&L GATES LLP

By: s/Hugh F. Bangasser  
Hugh F. Bangasser

Hugh F. Bangasser, (*Pro Hac Vice*)  
Ramona M. Emerson, (*Pro Hac Vice*)  
Christopher M. Wyant, (*Pro Hac Vice*)  
Jeffrey L. Bornstein, Bar No. 99358  
925 Fourth Avenue, Suite 290  
Seattle, WA 98104  
Tel: (206) 623-7580  
Fax: (206) 623-7022

Attorneys for Defendants HANNSTAR  
DISPLAY CORPORATION

MORGAN, LEWIS & BOCKIUS LLP

By: s/Kent M. Roger

Kent M. Roger

Kent M. Roger (Bar No. 95987)  
One Market, Spear Street Tower  
San Francisco, CA 94105  
Tel: (415) 442-1140  
Fax: (415) 442-1001

Attorneys for Defendants  
HITACHI, LTD., HITACHI DISPLAYS,  
LTD., HITACHI ELECTRONIC  
DEVICES (USA), INC.

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By: s/Michael R. Lazerwitz

Michael R. Lazerwitz

Michael R. Lazerwitz (*Pro Hac Vice*)  
2000 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
Tel: (202) 974-1500  
Fax: (202) 974-1999

Attorneys for Defendants  
LG DISPLAY CO., LTD., and LG  
DISPLAY AMERICA, INC.



COVINGTON & BURLING LLP

By: s/Timothy C. Hester  
Timothy C. Hester

Timothy C. Hester, (*Pro Hac Vice*)  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
Tel: (202) 662-6000  
Fax: (202) 662-6291

Attorneys for Defendants  
SAMSUNG ELECTRONICS AMERICA,  
INC., SAMSUNG SEMICONDUCTOR,  
INC., and SAMSUNG ELECTRONICS  
CO., LTD.

PILLSBURY WINTHROP SHAW PITTMAN  
LLP

By s/John M. Grenfell  
John M. Grenfell

John M. Grenfell (State Bar No. 88500)  
50 Fremont Street  
San Francisco, CA 94105  
Tel: (415) 983-1000  
Fax: (415) 983-1200

Attorneys for Defendants  
SHARP CORPORATION AND SHARP  
ELECTRONICS CORPORATION

WHITE & CASE LLP

By: s/John H. Chung  
John H. Chung

John H. Chung, (*Pro Hac Vice*)  
1155 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 819-8200  
Fax: (212) 354-8113

Attorneys for Defendants  
TOSHIBA CORPORATION, TOSHIBA  
MOBILE DISPLAY TECHNOLOGY CO.,  
LTD., TOSHIBA AMERICA  
INFORMATION SYSTEMS, INC.,  
TOSHIBA AMERICA ELECTRONIC  
COMPONENTS, INC.